

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Request for Review by Network Enhanced)
Telecom, LLP of Decision of Universal)
Service Administrator)
_____)

WC Docket No. 06-122

COMMENTS OF STI PREPAID, LLC

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Dated: September 9, 2009

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STi Prepaid, LLC (“STi Prepaid”), by its attorneys and pursuant to the August 10, 2009 Public Notice issued by the Federal Communications Commission (“FCC” or “Commission”),¹ hereby respectfully submits these comments on the Request for Review (“Request”) filed by Network Enhanced Telecom, LLP (“NetworkIP”) of a 2008 audit decision of the Universal Service Administrative Company (“USAC”).² NetworkIP’s Request demonstrates that there are systematic problems in the prepaid telecommunications service industry that need to be rectified by the Commission to protect consumers purchasing telecommunications services on a prepaid basis and to ensure effective competition between such service providers for the benefit of consumers.

Telecommunications carriers offering long distance services through prepaid calling cards or platforms serve the public interest by providing services to a portion of the public that may not otherwise be able to obtain telecommunications services due to insufficient credit,

¹ *Comment Sought on Network Enhanced Telecom, LLP Request for Review of a Universal Service Contribution Decision of the Universal Service Administrative Company*, WC Docket No. 06-122, DA 09-1778, Public Notice (rel. Aug. 10, 2009).

² *Request for Review by Network Enhanced Telecom, LLP, of Decision of Universal Service Administrator*, WC Docket No. 06-122, Request for Review of Network Enhanced Telecom, LLP of a Decision of the Universal Service Administrator in a Contributor Audit (filed June 29, 2009) (“Request”).

immigrant status, or living situation.³ Prepaid long distance services also offer consumers convenience, control over their telecommunications spending without the imposition of high monthly fees, and the ability to pay for only those services used. The goals of universal service mandated by Congress and the Commission are therefore served by the ability of consumers to access telecommunications services on a prepaid basis.⁴

NetworkIP's Request is only one example of the problems underlying the provision of telecommunications services on a prepaid basis. While there is legitimate controversy over the Commission's current requirement that interstate end user telecommunications service revenue generated from the sale of prepaid calling cards must be reported based on the face value of the card sold to the ultimate end user, there is virtually no regulatory uncertainty to account for the apparent flagrant disregard of the FCC's other rules and regulations by numerous providers of prepaid long distance services. These non-compliant providers are ignoring FCC rules that uniformly apply to the provision of telecommunications services. As a result, valuable universal service contributions are lost, consumers may be receiving substandard service from dubious carriers that employ unjust and unreasonable practices, and prepaid long distance service providers who adhere to Commission rules and regulations are being forced from the market because violators can severely undercut legitimate providers of service.

Accordingly, the rules applicable to telecommunications carriers providing prepaid long distance services must be clarified and strictly enforced to ensure a level playing field for all carriers. This includes addressing the types of issues raised by NetworkIP, such as reseller

³ See, e.g., Earl Juanico, *Prepaid Calling Card Market: Future Outlook* (Sept. 20, 2006), available at: <http://ezinearticles.com/?Prepaid-Calling-Card-Market-Future-Outlook&id=305241>.

⁴ 47 U.S.C. § 254; see also *Regulation of Prepaid Calling Card Services*, 21 FCC Rcd 7290, ¶ 1 (2006) ("*Prepaid Calling Card Order*") (taking "steps necessary to protect the federal universal service program and promote stability in the market for prepaid calling cards" by treating "certain prepaid calling card service providers as telecommunications service providers").

certification procedures and universal service contributions requirements that recognize wholesale/retail distinctions, as well as more basic issues such as registration and identification of the provider of the telecommunications service. The Commission has already determined it would be against the public interest to “leave calling card providers with substantial discretion to determine whether they are subject to numerous requirements” because “[s]uch an approach would not result in a level playing field among prepaid calling card providers, nor would it provide the type of regulatory certainty needed to prevent gaming.”⁵ With the enforcement of existing Commission regulations applicable to all telecommunications services provided via prepaid platforms, the intended beneficiaries of prepaid calling services will be able to realize the full benefit of the service and all carriers will be able to compete on a level playing field. As a result, “there will be no doubt as to the requirements that apply to prepaid calling card providers.”⁶

I. USAC’S AUDIT FINDINGS DEMONSTRATE COMMON PROBLEMS IN THE PREPAID LONG DISTANCE SERVICE MARKET

A. Reseller Certification Procedures Must Ensure All Required Carriers Are Contributing to Universal Service

According to NetworkIP’s Request, USAC determined that “approximately 85%” of NetworkIP’s wholesale carrier customers should be reclassified as “end users” for universal service purposes because NetworkIP did not employ adequate procedures to verify that those carriers contributed to universal service.⁷ NetworkIP, on the other hand, claims that it had a “reasonable expectation” that its carrier customers were contributors, and that is all that is

⁵ *Prepaid Calling Card Order* ¶ 9.

⁶ *Prepaid Calling Card Order* ¶ 9.

⁷ Request at 17.

required under the Commission's requirements.⁸ NetworkIP's reseller certification procedures, however, do not appear to meet the Commission's goal of "mak[ing] it more difficult for 'bad actor' resellers to stay in business."⁹

NetworkIP claims that neither the Commission nor the Instructions to the FCC Form 499-A require certain steps when verifying that carrier customers contribute to universal service.¹⁰ STi Prepaid disagrees. First and foremost, Section 64.1195(h) of the Commission's rules states that carriers have "an affirmative duty to ascertain whether a potential carrier-customer" has filed an FCC Form 499-A with the Commission prior to providing service to that carrier-customer.¹¹ The only way to make such a confirmation is to check the Commission's 499 Filer ID database, which the Commission is required to make available to the public pursuant to Rule 64.1195(h). Specifically, the rule states:

(h) Duty to confirm registration of other carriers. The Commission shall make available to the public a comprehensive listing of registrants and the information that they have provided pursuant to paragraph (b) of this section. A telecommunications carrier providing telecommunications service for resale shall have an affirmative duty to ascertain whether a potential carrier-customer (*i.e.*, reseller) that is subject to the registration requirement pursuant to paragraph (a) of this section has filed an FCC Form 499-A with the Commission prior to offering service to that carrier-customer. After notice and opportunity to respond, the Commission may impose a fine on a carrier for failure to confirm the registration status of a potential carrier-customer before providing that carrier-customer with service.¹²

⁸ Request at 17.

⁹ *Implementation of the Subscriber Carrier Selection Changes Provision of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Changes of Consumers Long Distance Carriers*, 15 FCC Rcd 15996, ¶ 66 (2000).

¹⁰ Request at 17-18.

¹¹ 47 C.F.R. § 64.1195(h).

¹² 47 C.F.R. § 64.1195(h).

When the first two sentences of the rule are read together, it makes clear that checking the Commission's database is the way to satisfy a carrier's "affirmative duty" to determine whether a potential carrier-customer is registered with the Commission.

Along with Rule 64.1195(h), the Commission has established a "reasonable expectation" standard for determining whether a customer may be classified as a reseller.¹³ Specifically, carriers may classify customers and revenues received from those customers as "carrier's carrier" if the customer "can reasonably be expected to contribute to support universal service."¹⁴ The Instructions to the FCC Form 499-A offer further direction on how a carrier may meet the "reasonable expectation" standard, although a carrier may establish its "reasonable expectation" in ways other than those listed in the Instructions.¹⁵ The Instructions provide procedures that wholesale carriers can use to document carrier customers and satisfy the reasonable expectation standard, such as maintaining information on the customer's 499 Filer ID.¹⁶

While NetworkIP asserts it had a "reasonable expectation" that its carrier customers contributed to universal service,¹⁷ it is unclear how such an expectation could be formed without checking the Commission's 499-A database to determine whether a carrier customer had a valid 499 Filer ID. The Commission's rules (and arguably the 499-A Instructions¹⁸) affirmatively

¹³ Request, Exhibit B at 18 (2005 FCC Form 499-A Instructions).

¹⁴ Request, Exhibit B at 18 (2005 FCC Form 499-A Instructions).

¹⁵ *Federal-State Joint Board on Universal Service, Request for Review of Decision of the Universal Service Administrator by Global Crossing Bandwidth, Inc.*, CC Docket No. 96-45, Order, DA 09-1821, ¶¶ 13, 17 (rel. Aug. 17, 2009) ("Global Crossing Order").

¹⁶ See, e.g., Request, Exhibit B at 18 (2005 FCC Form 499-A Instructions).

¹⁷ Request at 17.

¹⁸ NetworkIP wrongly focuses on the use of the word "should" in the Instructions in claiming that courts have determined that the use of the word "should" indicates a suggestion rather than a requirement. See Request at 18. Just as many courts have found that the word "should" means "must" or "shall." See, e.g., *U.S. v. Montgomery*, 462 F.3d 1067, 1069-70 (9th Cir. 2006) ("we first dispose of the government's argument that 'should' is a permissive term. . . . contrary to the government's argument, use of the word 'should' is not unambiguous and must be read in context"); *United States v. Paladino*, 401 F.3d 471, 484 (7th Cir.2005) ("By 'should' in the quoted passage [of

require the Commission's database to be reviewed prior to offering service to a carrier customer. Moreover, as a practical matter, checking the database is the only definitive way to confirm a carrier's status and thus establish a "reasonable expectation."

B. The Carrier that Holds Itself Out to the Public to Provide the Long Distance Service Must Contribute to USF and Revenues Obtained from the Sale of Prepaid Calling Cards Should Not Be Assessed for Universal Service Purposes Based on the Face Value of the Card Unless the Face Value of the Card Reflects the Actual End User Revenue Generated

While STi Prepaid agrees with NetworkIP that its services are "telecommunications services,"¹⁹ STi Prepaid expresses no opinion on whether the services offered by NetworkIP should be reported as "prepaid calling card" revenues or "ordinary long distance" revenues on the FCC Form 499-A.²⁰ The key to this question depends on who is holding itself out to provide the long distance services associated with the prepaid platform.²¹ NetworkIP's Request does not address who is listed as the provider of telecommunications services on the prepaid calling cards issued by its carrier customers. This is generally the determinative factor as to which entity must contribute directly to the fund and would also address whether NetworkIP's revenues are appropriately classified as "prepaid calling card" revenues. Several states have adopted prepaid calling card disclosure requirements that require the exact name of the entity providing the

United States v. Crosby, 397 F.3d 103, 117 (2d Cir. 2005)] we understand 'must.'"); *Stanford v. Swenson*, 381 F.2d 755, 757 (8th Cir. 1967) ("When used in statutes the word 'shall' is generally regarded as an imperative or mandatory and therefore one which must be given a compulsory meaning."). The meaning depends on the context in which the word is found. *See Bord v. Rubin*, 1998 WL 420777, at *4 (S.D.N.Y. July 27, 1998) ("If the contradictory authorities cited above can be said to stand for any proposition, it is that the use of the word 'should' does not automatically denote either a mandatory or a permissive direction. Rather, the meaning depends on the context in which the words are found."). When the Instructions are read in light of Rule 64.1195(h), the Instructions' use of the word "should" can mean nothing other than "shall" or "must" in this context.

¹⁹ Request at 13.

²⁰ Request at 7.

²¹ *See, e.g., National Ass'n of Regulatory Util. Comm'rs v. FCC*, 525 F.2d 630 (D.C. Cir. 1976) (*NARUC I*), cert. denied, 425 U.S. 992 (1976); *National Ass'n of Regulatory Utility Comm'rs v. FCC*, 533 F.2d 601 (D.C. Cir. 1976) (*NARUC II*); *Virgin Islands Tel. Co. v. FCC*, 198 F.3d 921 (D.C. Cir. 1999).

telecommunications service to be listed on the prepaid calling card.²² If NetworkIP is listed as the provider of telecommunications service on the prepaid calling card, or is holding itself out as the provider of the telecommunications services associated with the cards, it may be appropriate to classify NetworkIP's revenues as "prepaid calling card" revenues for universal service purposes.

Notwithstanding whether USAC's classification of NetworkIP's revenues as "prepaid calling card" revenues was correct, STi Prepaid does agree with NetworkIP that requiring prepaid calling card revenues to be reported at "face value" of the prepaid card is not appropriate when prepaid cards are sold to intermediate entities on a wholesale basis.²³ For example, STi Prepaid sells prepaid cards via two distinct channels - retail directly to the end user customer making the long distance call and wholesale to retailers or distributors. For those cards sold on a retail basis directly to the end user, face value is an appropriate measure of revenues. When prepaid cards are sold at retail without any intermediate entities, the carrier receives the full face value of the card.

Providers of ordinary long distance services contribute to the universal service fund based on interstate end user revenue generated. Carriers selecting to offer prepaid options to the public should not be treated any differently simply because of the payment method offered to the public. This disparate treatment between long distance carriers, however, is exactly what the Instructions to the FCC Form 499-A require. STi Prepaid and other telecommunications carriers

²² See, e.g., FLA. ADMIN. CODE 25-24.920 (requiring a carrier's "Florida certificated or registered name, or 'doing business as' name" to be "legibly printed on the card" and "clearly identified as the provider" of service); NY PUB. SERV. LAW § 92-f (mandating the "name of the company" to be printed "legibly on each card"); TELEPHONE RULES OF THE ALABAMA PUBLIC SERVICE COMMISSION, Rule T-18.1 (stating that "the name of the Certificated entity must be printed on the card"); see also, e.g., 47 C.F.R. §§ 64.2400(a), 2401(a)(1) (requiring the name of the service provider associated with each charge to be identified on telephone bills so that consumers have the tools they need to make informed choices in the market for telecommunications service).

²³ Request at 23-30.

offering service on a prepaid card basis are being assessed universal service contributions based on revenues they do not actually receive.²⁴

As NetworkIP points out, other than concluding that interstate and international revenues obtained from the provision of telecommunications via prepaid cards are assessable for universal service purposes,²⁵ the Commission itself has never specifically addressed how such revenue should be reported and how contributions should be assessed in the prepaid environment.²⁶ The requirement to report revenues based on the face value of the prepaid card does not account for the various links that may exist in the distribution chain between the underlying service provider and the end user customer, a chain that the Commission has previously recognized.²⁷ As the examples described in NetworkIP's Request demonstrate, uniformly assessing universal service contributions on the face value of the prepaid card, without taking other factors into consideration, is inequitable and places carriers offering telecommunications services via prepaid platforms at a disadvantage vis-à-vis other telecommunications carriers.

II. NETWORKIP'S REQUEST DEMONSTRATES THAT GREATER ENFORCEMENT OF EXISTING RULES APPLICABLE TO PROVIDERS OF TELECOMMUNICATIONS SERVICES OFFERED ON A PREPAID BASIS IS NECESSARY

NetworkIP's Request is a perfect example of why more stringent enforcement of the Commission's existing rules applicable to the provision of telecommunications services offered

²⁴ Cf. *Texas Office of Public Utility Counsel v. FCC*, 183 F.3d 393, 434 (5th Cir. 1999) (finding it would violate "the equitable language in the statute" to have a carrier "pay more universal service contributions than it can generate in interstate revenues").

²⁵ *Prepaid Calling Card Order* ¶ 22.

²⁶ Request at 23-24.

²⁷ *AT&T Corp., Complainant v. BellSouth Corporation, and its Carrier Subsidiaries and Affiliates, including (but not limited to) BellSouth Long Distance, Inc. and BellSouth Telecommunications, Inc., Defendant*, 14 FCC Rcd 8515 (1999) ("*BellSouth Calling Card Order*") (recognizing that BellSouth was acting as the issuer of a prepaid card while another carrier actually provided the underlying telecommunications service).

on a prepaid basis is necessary.²⁸ As NetworkIP points out, its competitors do not appear to contribute to universal service,²⁹ and, as explained below, a quick survey of the prepaid calling cards available in various retail outlets demonstrates that many providers of prepaid calling cards are not registered with the Commission or do not contribute to universal service.

All entities offering telecommunications services via prepaid platforms must be subject to the same set of regulatory requirements -- from payment obligations for federal programs to clear identification of the telecommunications service provider. To achieve this, the Commission must aggressively enforce its existing rules. This will ensure a level playing field for all carriers offering telecommunications services via prepaid platforms and allow consumers to realize the full benefits of competitive prepaid telecommunications services.

Under the Commission's rules, all telecommunications carriers are required to register with the Commission by providing certain information on FCC Form 499-A.³⁰ The Commission has confirmed that carriers offering telecommunications services via prepaid calling cards are required to contribute to universal service as well as other federal funds relating to telecommunications relay service ("TRS"), local number portability ("LNP"), and the North American Numbering Plan ("NANP").³¹ Despite these clear rules, several apparent carriers offering prepaid telecommunications services do not attempt to comply with even the most basic

²⁸ Cf. *Prepaid Calling Card Order* at n.88 ("To the extent prepaid calling card providers are 'common carriers' under section 208 of the Act, a violation of these rules would constitute an actionable violation of section 201(b) of the Act, because the requirements imposed on calling card providers by these rules are necessary to preserve and advance the Universal Service Fund, provide regulatory certainty, and prevent 'gaming' of the system.").

²⁹ Request at 4.

³⁰ 47 C.F.R. § 64.1195.

³¹ *Prepaid Calling Card Order* ¶ 21 ("As a result of our finding that providers of the two types of prepaid calling cards described in the previous section offer telecommunications services, these providers are now subject to all of the applicable requirements of the Communications Act and the Commission's rules, including requirements to contribute to the federal [universal service fund] and to pay access charges.").

regulatory requirements for telecommunications carriers, such as registering with the Commission. For example:

- **ITG** - According to the Commission's 499 Filer ID database, ITG is not registered with the Commission. Yet, as demonstrated in [Attachment 1](#), ITG sells prepaid calling cards using posters that specifically indicate "Services provided by ITG."
- **LLD** - According to the Commission's 499 Filer ID database, LLD is not registered with the Commission. Yet, as demonstrated in [Attachment 2](#), prepaid calling card advertisements indicate "Network services provided by LLD."
- **ETB Colombia** - According to the Commission's 499 Filer ID database, ETB is not registered with the Commission, but as demonstrated in [Attachment 3](#), ETB offers prepaid calling cards for sale to the public. ETB's poster does not indicate whether ETB or another entity is the underlying provider of services.
- **Simple2Call and Simple Network, Inc.** - According to its website, Simple Network offers "network services to its customers" and "wholesale telecommunications services to carriers," and its affiliate, Simple2Call offers prepaid phone cards (see [Attachment 4](#)). However, neither Simple2Call nor Simple Network, Inc. are listed in the FCC's 499 Filer ID database.

Further, there are carriers offering telecommunications services via prepaid cards that do not appear to contribute to universal service. For example:

- **Tele-Center, Inc. (TCI)** - TeleCenter, Inc. is registered with the FCC (Filer ID 823510), but the FCC's 499 Filer ID database indicates that no filings have been made by the company since 2003 and that the company does not contribute to universal service. As demonstrated in [Attachment 5](#), however, TCI is selling prepaid calling cards in retail locations and on the Internet. It is unclear whether TCI or another entity is the underlying provider of services.
- **Nobel** - Nobel offers prepaid calling cards through its affiliates NobelCom and Nobel, Ltd. as shown in [Attachment 6](#). NobelTel is registered with the FCC (Filer ID 823026), but it is unclear how this company is related to the prepaid providers. Nobel's website states that "Network services are provided by Nobel, LLC, a Delaware Limited Liability Company, and its affiliate carriers. Nobel, LLC is not affiliated with Nobel, Ltd." Further, Nobel's cards indicate that a "federally authorized" universal service charge may apply, but the FCC's Filer ID database indicates that NobelTel does not contribute to universal service.
- **Lyca Tel** - Lyca Tel is registered with the FCC (Filer ID 826369), but the FCC's Filer ID database indicates that no filings have been made by the company since 2006 and that the company does not contribute to universal service. As demonstrated in

Attachment 7, however, Lyca Tel is selling prepaid calling cards that indicate “All Services for this card are provided by Lyca Tel, LLC (Lyca Tel), a licensed and certified telecommunications provider.”

In addition, there are entities selling prepaid calling cards that do not supply information identify the carrier providing the telecommunications service. For example:

- **Millennium or MTC** - Millennium offers prepaid calling cards, but is not registered with the FCC. It is unclear whether MTC or another entity is the underlying provider of services because, as demonstrated in Attachment 8, Millennium’s marketing materials only use the term “Carrier” to describe the provider of services, and its prepaid calling cards provide no information at all on the service provider.

These are only a few examples of telecommunications carriers offering services via prepaid calling cards that appear to be violating even the most basic regulatory requirements. But this short list demonstrates some of the systematic problems in the prepaid telecommunications service industry that need to be corrected through stricter enforcement of existing Commission rules.

The Commission has expressed a long-standing interest in ensuring a “level playing field” between carriers and promoting equal treatment of like services in order to increase competition and protect the interests of consumers.³² This requires the equal treatment of all participants in a particular market by applying rules and regulations in an equitable fashion.³³

³² See, e.g., *Applicable Regulatory Treatment for Broadband Access to the Internet over Wireless Networks*, 22 FCC Rcd 5901, ¶¶ 53, 55-56 (2007) (establishing definition of commercial mobile radio services that excludes mobile wireless broadband Internet access service “supports the Congressional goal of promoting broadband deployment and encouraging competition in the provision of broadband services, by ensuring regulatory parity among all broadband Internet access services - regardless of whether they are offered through wireline, cable, or wireless technology,” and holding that such “a uniform, technology neutral regulatory scheme for the provision of all wireless Internet access services. . . . serves the [Telecommunications Act’s] overarching goal of fostering competition by providing a level playing field in the market and removing unnecessary regulatory impediments”); *Promoting Efficient Use of Spectrum Through Elimination of Barriers to the Development of Secondary Markets*, 15 FCC Rcd 24203, ¶ 93 (noting that harmonization of spectrum service rules “provides regulatory neutrality to help establish a level playing field across technologies and thereby foster more effective competition”) (citing *Principles For Reallocation of Spectrum to Encourage the Development of Technologies for the Telecommunications New Millennium*, 14 FCC Rcd 19868, ¶ 9 (1999)).

³³ See, e.g., *IP-Enabled Services*, 19 FCC Rcd 4863 (2004) (“But for this transformation [to IP-enabled services] to happen with real spark. . . . we need to address intercarrier compensation to create a level playing field that minimizes arbitrages and maximizes the opportunities for new technologies to flourish”) (concurring statement).

Regulatory compliance is a cost of doing business in a regulated market, but when all companies in the market do not follow those regulations, both consumers and regulatory-compliant businesses suffer. Companies that ignore their regulatory obligations often engage in practices that are harmful to consumers, and make it more difficult for legitimate businesses to survive and compete against below-cost offerings that do not take into account the costs of regulatory compliance. Enforcement of existing Commission regulations for prepaid telecommunications services is the only way to ensure all providers are playing by the same set of rules and consumers receive the best service possible.

of Commissioner Copps)); *Remarks by FCC Chairman Kevin J. Martin "Balancing Deregulation and Consumer Protection,"* 2009 WL 56765, *2 (Jan. 8, 2009) (explaining the importance of "a regulatory environment that promotes investment and competition, setting the rules of the road so that players can compete on a level playing-field.").

CONCLUSION

NetworkIP's Request demonstrates the need for stricter enforcement of regulations applicable to the prepaid telecommunications services industry. Accordingly, STi Prepaid urges the Commission to take the following steps: (1) enforce existing regulations applicable to providers of telecommunications services against providers of prepaid telecommunications services; and (2) ensure application of existing rules take into consideration the specific characteristics of the prepaid telecommunications service industry.

Respectfully submitted,

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Dated: September 9, 2009

Attachment 1

100% ADVERTISED MINUTES UNTIL 6/15/09 IF USED FOR A SINGLE CALL, EXCEPT FROM PAYPHONES, PLACED TO LANDLINES.

FEES AND CONDITIONS

All of the following fees will reduce the number of available minutes and the value of the card. Use of a toll free number from a pay phone will incur a \$0.99 per call fee. Call time for multiple calls is calculated by rounding the last minute up to the closest multiple of 3 and then adding 1 minute* except that if your call lasts less than 1 minute you will be charged only for a minute. If available minutes are not all used up on the first call the following fees will apply: (1) the multiple call rate will be 50% higher and will apply to all calls (see chart below)**; (2) a fee per call of \$0.75 will apply to each call; and (3) on midnight after the first call a fee of \$0.69 will be deducted and then weekly thereafter. **CARD EXPIRES 3 MONTHS AFTER FIRST USE.** Cards are not returnable or exchangeable and have no cash value. Rates and fees are introductory and are subject to change at any time after 6/15/09. For current rates and fees, please call customer service. Calls to destinations where telecommunications networks are not technologically advanced may result in calls getting cut off or rated incorrectly. If this occurs please call customer service at 1-800-915-1518 to receive a refund of minutes.

Todos los siguientes cargos reducirá el número de los minutos disponibles y el valor de la tarjeta. El uso de un número de llamada gratuita de un teléfono público cobrará un cargo de \$0.99 por llamada. Tiempo de llamada de múltiples llamadas es calculado redondeándole el último minuto hasta cerca del múltiplo de 3 y después agregando 1 minuto* excepto de que si la llamada duro menos de un minuto, será cargado solo por un minuto. Si los minutos disponibles no son usados en la primera llamada, los siguientes cargos serán aplicados: (1) la tarifa de múltiple llamada será de 50% mas alto y será aplicado a todas las llamadas (ver la carta abajo)**; (2) una tarifa por llamada de \$0.75 se aplicará a cada llamada; y (4) a la media noche después de la primera llamada, un cargo de \$0.69 será reducido y a partir de entonces será semanalmente. **LA TARJETA EXPIRA 3 MESES DESPUES DEL PRIMER USO.** Las tarjetas no son retornables ni intercambiables y no tienen ningún valor monetario. Tarifas y cargos son anunciados y serán sujetos a cambiar en cualquier momento después de 6/15/09. Para tarifas y cargos actuales, por favor llamar al Servicio al Cliente. Las llamadas a cualquier destino donde redes de telecomunicaciones no son tecnológicamente avanzadas pueden resultar en llamadas cortadas, o ser tasadas incorrectamente. Si esto ocurre, por favor llamar al Servicio del Cliente 1-800-915-1518 para recibir un reembolso de minutos.



BRAZIL 90 227 MOBILE 25 62 2.2¢ /MIN	MEXICO 36 90 MOBILE 28 70 6¢ /MIN	GUATEMALA 22 55 MOBILE 22 55 9.1¢ /MIN	EL SALVADOR 16 40 MOBILE 16 40 13¢ /MIN
COLOMBIA 80 200 MOBILE 38 96 3¢ /MIN	COSTA RICA 47 119 MOBILE 42 106 4.3¢ /MIN	ECUADOR 20 50 MOBILE 16 40 10¢ /MIN	EGYPT 28 70 MOBILE 28 70 7.1¢ /MIN
ETHIOPIA 11 27 MOBILE 11 27 18.2¢ /MIN	HAITI 16 40 MOBILE 14 35 13¢ /MIN	HONDURAS 32 80 MOBILE 17 42 6.3¢ /MIN	INDIA 100 250 MOBILE 142 357 2¢ /MIN
JORDAN 114 285 MOBILE 40 100 2¢ /MIN	KENYA 26 65 MOBILE 24 60 8¢ /MIN	LEBANON 30 75 MOBILE 20 50 7¢ /MIN	LIBERIA 10 25 MOBILE 10 25 20¢ /MIN
MOROCCO 30 75 MOBILE 9 22 7¢ /MIN	NIGERIA 24 60 MOBILE 24 60 8.3¢ /MIN	PHILIPPINES 20 50 MOBILE 20 50 10¢ /MIN	SYRIA 19 47 MOBILE 15 37 11¢ /MIN

RATE	Single Call/Min	\$2	\$5	Multi Call Rate/Min	RATE	Single Call/Min	\$2	\$5	Multi Call Rate/Min
BRAZIL	90	227	0.03	INDIA	100	250	0.03		
BRAZIL-Mobile	25	62	0.10	INDIA-Mobile	142	357	0.02		
COLOMBIA	80	200	0.03	JORDAN	114	285	0.02		
COLOMBIA-Mobile	38	96	0.07	JORDAN-Mobile	40	100	0.06		
COSTA RICA	47	119	0.05	KENYA	26	65	0.10		
COSTA RICA-Mobile	42	106	0.06	KENYA-Mobile	24	60	0.11		
ECUADOR	20	50	0.13	LEBANON	30	75	0.09		
ECUADOR-Mobile	16	40	0.16	LEBANON-Mobile	20	50	0.13		
EGYPT	28	70	0.09	LIBERIA	10	25	0.26		
EGYPT-Mobile	28	70	0.09	LIBERIA-Mobile	10	25	0.26		
EL SALVADOR	16	40	0.16	MEXICO	36	90	0.07		
EL SALVADOR-Mobile	16	40	0.16	MEXICO-Mobile	28	70	0.09		
ETHIOPIA	11	27	0.24	MOROCCO	30	75	0.09		
ETHIOPIA-Mobile	11	27	0.24	MOROCCO-Mobile	9	22	0.28		
GUATEMALA	22	55	0.12	NIGERIA	24	60	0.11		
GUATEMALA-Mobile	22	55	0.12	NIGERIA-Mobile	24	60	0.11		
HAITI	16	40	0.16	PHILIPPINES	20	50	0.13		
HAITI-Mobile	14	35	0.18	PHILIPPINES-Mobile	20	50	0.13		
HONDURAS	32	80	0.08	SYRIA	19	47	0.14		
HONDURAS-Mobile	17	42	0.15	SYRIA-Mobile	15	37	0.17		

*For example, 7 minutes will be deducted for a 5 minute call.

Services provided by ITG

RETAILER MUST REMOVE POSTER FROM DISPLAY UPON EXPIRATION (6/15/09)
EL VENDEDOR DEBE QUITAR LA PROPAGANDA DE EXHIBICIÓN UNA VEZ QUE ESTE EXPIRE (6/15/09)

Attachment 2

Attachment 3

**En estas navidades
ETB esta contigo y
con los tuyos.**

**iLlama a Colombia hoy con
estas tarifas de navidad!**



**iLlama a Colombia con Acceso
1-800 Gratis Desde Todo el País!**

		Todo Colombia	Colombia Celular
	\$10	207	150
	\$5	103	74
	\$2	41	29

Llamadas a Colombia de local extendido US\$0.20 min. y celulares US\$0.08 min. Si la llamada se realiza desde teléfono público un cargo adicional de US\$0.50 llamada. Llamadas desde USA a cualquier parte del mundo excepto Colombia, serán facturadas hasta US\$1.66 min. Los precios por minuto pueden ser cambiados sin previo aviso.

Exprésate

eTb

USPT 1-19-05

Attachment 4

HOME	PRODUCTS	CUSTOMER SUPPORT	RATE FINDER	MY PROFILE	CONTACT US
------	----------	------------------	-------------	------------	------------

Simple2Call - "Expect the best!"

Simple2Call prides itself in providing superior quality telecom products at competitive prices and around the clock customer support.

Simple Network, Inc. of Edison, N.J., started offering network services to its customers in 1990 and wholesale telecommunications services to carriers in 1994. Simple Network, Inc. which deployed its network and switching with superior prepaid platform having enormous capacity provides quality services to wholesale customers and has now launched an aggressive online campaign for its quality competitive retail telecom products.

Simple Network, Inc. caters to consumers through its affiliate www.simple2call.com. It was the first company to introduce no-connection-fee, prepaid phone cards for calls to India, Pakistan, Bangladesh and Sri Lanka. Simple Network, Inc. through its website www.simple2call.com now offers no-connection-fee cards to call anywhere in the world and is expanding further with 1-plus service and many other cutting edge telecom products. It is also national distributor of prepaid calling card. For more information you can visit www.simple2call.com

Thank you for being a Simple2Call patron.

Fax: (732) 452-1010

Email: info@simple2call.com

Address:

Simple2Call
25 South Main St. Suite # 6
Edison, NJ 08837
USA

[wholesale](#) | [add to favorite](#) | [privacy policy](#) | [about us](#) | [contact us](#) | [local access numbers](#)

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[Home](#)

[Products](#)

[My Account](#)

[Rate Finder](#)

[Customer Support](#)

[Contact Us](#)

Direct Connect Worldwide

				
India	Pakistan	Bangladesh	Srilanka	Philippines
3.1¢	5.5¢	2.8¢	8.8¢	10¢

- No Hidden Charges
- Online Recharge
- Speed Dialing
- Pinless Dialing

Customer Login

Login

Password

[Password reminder...!](#)

Select a Country	<input type="text" value="Select Country"/>
----------------------------------	---------------------------------------------

INDIA 2.5 cent/min

\$10 400 min	\$25 1000 min	\$50 2000 min
------------------------	-------------------------	-------------------------

\$5 NO Maintenance Fee
Connection Fee
Hidden Charges

MOTHERINDIA™
www.motherindiacard.com

► No Hidden Charges ► No Connection Fee ► Pinless Dialing

- No switching
- No commitments
- Premium quality
- Best voice quality
- Great savings...!!



To your convenience, now recharge
CallPack made easy.
[Click Here!!](#)

24/7 Customer Service
Push To Talk
Click Here!!



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Attachment 5



U.S.A. EXPRESS

CALL ANYWHERE IN THE U.S.A. FOR JUST

Great New Rates

1¢ PER MINUTE

TOLL FREE 800 ACCESS

NO CONNECTION FEES

	min/\$5 Card	min/\$10 Card
U.S.A.	500	1000
MEXICO	102	204

WESTERN COUNTRIES			EASTERN EUROPE					
AUSTRALIA	 \$5 CARD 263 MINUTES \$10 CARD 526 MINUTES	ITALY	COUNTRY	RATE	\$5	COUNTRY	RATE	\$5
AUSTRIA		JAPAN	CROATIA	3¢	128	BULGARIA	8¢	56
BELGIUM		NETHERLANDS	CZECH REP.	3¢	128	ROMANIA	8¢	56
CANADA		NEW ZEALAND	HUNGARY	3¢	128	SLOVAKIA	8¢	56
DENMARK		NORWAY	POLAND	3¢	128	UKRAINE	8¢	56
FRANCE		PORTUGAL	RUSSIA	3¢	128	YUGOS.	8¢	56
FINLAND		SINGAPORE						
GERMANY		SPAIN						
GREECE		SWEDEN						
HONG KONG		SWITZERLAND						
IRELAND		U.K.						

001
SE LE

ECT
BRARI

OR VISIT US AT:
www.tci prepaid.com

CALLS ARE BILLED WITH A 3 MINUTE INCREMENT. CALLS FROM PAY-PHONES IN USA ARE SUBJECT TO AN SURCHARGE. INTERNATIONAL CALLS TO CELLULAR PHONES MAY BE BILLED AT HIGHER RATE. NEW TC OUTPOST BASED ON ONE CALL PER CARD. A WEEKLY SERVICE / MAINTENANCE FEE OF 9¢ MAY APPLY. APPLICABLE TAXES AND CHARGES MAY APPLY. ALL PRICES AND CHARGES ARE SUBJECT TO CHANGE WITHOUT NOTICE. DIFFERENT RATES AND FEES APPLY TO COLLECT CALLS. 1-800-275-2755

Attachment 6

Millions of customers agree: with low rates, great connectivity and superior customer service

NOBEL.COM
Free Online Phone Cards

NobelCom provides low-cost online prepaid phone cards for international long distance calling. Just choose the country that you wish to call, and NobelCom will show you a selection of prepaid calling cards to choose from.

SEARCH »

MORE INFO

Additional recharges bring more discounts



TESTED 29. SEP.

Secured
by
 thawte



McKingsinger's
BEST
2006

15 MIN
FREE



LOWEST RATES TO CALL AFRICA | NORTHERN

 Algeria	6.9¢	 Morocco	9.9¢
 Egypt	8.9¢	 Nigeria	5.4¢
 Eritrea	13.4¢	 Senegal	8.9¢
 Ethiopia	14.9¢	 Sudan	5.9¢
 Ghana	4.4¢	 Togo	16.9¢
 Ivory Coast	9.9¢	 Tunisia	11.9¢

Whether you are a member of an executive team or the owner of a small business, Nobel's Corporate Calling Card Accounts Program is designed with our business customers in mind.

[READ MORE »](#)

SIGN UP NOW »

Get \$5 Off Your First Order

Get Rewarded by Nobel

Win Trips, Laptops, etc.

Refer-a-Friend & Earn \$10+

Save with Local Access

Earn Profits with Nobel

and many more...

All About the Most Popular Prepaid Calling Card Destinations: Phone Card Rates, Dialing Codes & More

<u>Afghanistan</u>	10.9¢	<u>France</u>	1.3¢	<u>Japan</u>	2.1¢	<u>Romania</u>	2.4¢
<u>Argentina</u>	1.2¢	<u>Germany</u>	1.3¢	<u>Korea South</u>	1.4¢	<u>Russia</u>	2.2¢
<u>Australia</u>	1.3¢	<u>Greece</u>	1.4¢	<u>Mexico</u>	1.8¢	<u>South Africa</u>	4.4¢
<u>Brazil</u>	1.9¢	<u>India</u>	2.9¢	<u>Nigeria</u>	5.4¢	<u>Spain</u>	1.2¢
<u>Bulgaria</u>	1.9¢	<u>Iran</u>	6.4¢	<u>Pakistan</u>	6.9¢	<u>Thailand</u>	1.1¢
<u>Canada</u>	0.9¢	<u>Iraq</u>	4.4¢	<u>Peru</u>	2.4¢	<u>Ukraine</u>	6.9¢
<u>China</u>	1.1¢	<u>Israel</u>	1.4¢	<u>Philippines</u>	6.9¢	<u>United Kingdom</u>	0.9¢
<u>Colombia</u>	3.4¢	<u>Italy</u>	1.4¢	<u>Poland</u>	0.8¢	<u>United States</u>	0.9¢

The original phone card site, NobelCom.com is still the best! With rechargeable cards, the best international and domestic rates, NobelCom.com issues thousands of phone cards every day.

Prepaid Phone Cards

With the same low cost structure of all Nobel products, Enjoy Prepaid's calling card plans are the best solution for domestic and international callers.

International Calling Cards

NobelTel is a facilities-based carrier, with presence in five global SuperPOPs. NobelTel operates an advanced TDM/VoIP network, supported by a 24/7 NOC.

Facilities-based Global Carriers

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best phone card






EMAIL
PASSWORD
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En Español
 Choose your country:
 United States

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 **VIEW CART**

 **RECHARGE**

 **MY ACCOUNT**

The World's Leading Phone Card Website

About NobelCom, the leader in Prepaid Phone Cards Online



NobelCom.com is the first retail website launched by Nobel, Ltd. Founded in 1998 by Thomas Knobel, Nobel, Ltd. is a market leader in the global telecommunications industry. Nobel, Ltd. has grown from pioneering online prepaid phone cards with NobelCom.com to offering an array of telecommunications services.

NobelCom provides online customers with a secure way to purchase affordable, easy-to-use prepaid phone cards. Through innovative business strategies and advanced technologies, Nobel, Ltd. has developed its own facilities-based carrier division. A key advantage of our TDM/VoIP network is that it allows us to offer low rates and excellent connection quality worldwide.

Prepaid phone cards are an excellent solution for affordable long-distance calling without changing an existing phone provider. In addition, NobelCom products are rechargeable online. Customer satisfaction is the highest priority at NobelCom. We are one of the few phone cards websites to offer live customer support 24 hours a day, 7 days a week.

In 2004, the success of Nobel, Ltd. was recognized by the Inc. 500 independent magazine. Nobel, Ltd. was ranked number 79 on Inc. Magazine's 23rd annual list of fastest growing private companies in the United States.

With low rates, great connectivity and superior customer service NobelCom is the premier source for prepaid phone cards. For more information on Nobel, Ltd., visit our corporate site at www.nobelglobe.com.

Nobel, Ltd. was recommended as the best source for prepaid phone cards in 2006 by Kiplinger's, the renowned national magazine dedicated to personal finance, in its special November issue. This award acknowledges our efforts to offer affordable long distance services at high quality available worldwide.

Nobel, Ltd. is based in Bermuda, with global offices in North America, Latin America, Eastern Europe and Western Europe.



Phone Card Search

Call From:

Call To:

SEARCH »

NobelCom.com

The original phone card site, NobelCom.com is still the best! With rechargeable cards, the best international and domestic rates, NobelCom.com issues thousands of phone cards every day.

[Prepaid Phone Cards](#)

Enjoy Prepaid

With the same low cost structure of all Nobel products, Enjoy Prepaid's calling card plans are the best solution for domestic and international callers.

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Kiplinger's
best phone card



The United States government polices and controls the export of products and information, including, but not limited to, software. You must comply with restrictions placed on products and information by the United States government and not export or re-export the Content, Information, Service, Products, Software, or Demonstrations to countries or persons prohibited under the export control laws. By downloading the Content, Information, Service, Products, Software, or Demonstrations, you are agreeing that you are not in a country to which such export of products and information is prohibited. By downloading the Content, Information, Service, Products, Software, or Demonstrations, you are also agreeing that you are not a person or entity to which such export of products and information is prohibited. You are solely responsible for complying with all laws of your local jurisdiction, as well as laws of the jurisdictions in which the information travels through to you, regarding the import, export, or re-export of the Content, Information, Service, Products, Software, or Demonstrations.

16. CALLING CARD USAGE

Following is our general statement on calling card usage. For specific card rules and regulations, please see such rules and regulations for the specific card.

Promotions, discounts, and contest winnings available on the site may not be used in conjunction with any other form of discount or promotion already applied for a given calling card purchase. No discount or promotion may be applied to a calling card after it has been purchased. Effective per-minute rate realized depends on efficient use of included minutes.

Calling Card Rates may vary. Rates are the rate set forth for each specific calling card plus any added fee(s), and/or charge(s) set forth herein or in information for a calling card. A connection fee may apply to each domestic and international call and varies by country unless otherwise stated and such fee shall be charged to your calling card. All calls are billed in 1 minute increments and rounded up unless otherwise stated. For each answered call, billing begins no earlier than the point at which the PIN is entered.

Local and Regional Phone Company charges may apply and such fees shall be charged to your calling card. Public payphones may incur an additional charge of up to \$0.99 depending on the payphone carrier's policy. Some Calling Cards have a maintenance fee of up to \$0.99 a week which will be applied to your calling card within 30 days of first use, as specified. An 800 access fee may be applied to calls without a valid destination number and such fee shall be charged to your calling card. Outside of the United States, 800 access fees may be applied even to calls with valid destination numbers. Access fees to local access numbers may be applied. Federal, State, and local taxes for Lifeline Assistance and Universal Service Fund will be deducted from your calling card. Calls to Directory Assistance will be charged at a higher rate and such fee shall be charged to your calling card.

Not all telephones are compatible with PIN calls. Access to compatible telephones is limited in some locations.

Due to customer demand for simplicity of use, most of our phone cards utilize the ** key to signify the end of a call. This improves the ease of usage for customers wishing to not re-enter their PIN to make a new call.

Nobelcom.com delivers calling cards to your e-mail account within minutes of placing your order.

For fraud protection purposes, first-time customers may be subject to telephone verification before shipment. If the NobelCom.com system flags your order for verification, one of our customer service representatives will call you within the next 24 business hours or ASAP to confirm your order over the phone, depending on the option chosen in the sign-up process.

For certain high-risk customers, including those abroad and overseas, Nobelcom.com customer service representatives may ask for copies of documentation for verification purposes. This may include, but is not limited to, a passport, driver's license, or a copy of the front and back of the credit card used. In requesting and accepting such documentation, Nobelcom.com will always adhere to the requirements of applicable privacy laws and its credit card merchant agreements.

Please call us at 1-888-520-9215 if you have any questions about our instant delivery or fraud protection policies. Customer service representatives are available 24/7 toll free, in the United States and Canada.

Billing errors may occur. If you have been undercharged, we, in our sole discretion, may charge your provided credit card and/or your PIN or calling product the amount for which you were incorrectly not charged.

NOBEL is committed to providing the lowest phone card rates possible. Therefore, on orders of less than \$40.00 we charge a processing fee to cover our cost in verifying the identity of our customers and managing these purchases. This fee is charged irrespective of the method of payment. All non-rechargeable calling cards expire 90 days after first use or 1 year (365 days) after day of issue. All rechargeable calling cards expire 1 year (365 days) after last use unless otherwise stated.

Prices are subject to change without notice. Refunds will be offered in the form of exchanges or store-credit on all cards having a full balance, excluding discontinued products.

Any PIN-less dialing capability will expire and become inoperative 180 days after the date of the PIN's activation, or if the PIN is recharged, 180 days after the latest recharge.

NobelCom.com phone service is not compatible with automatic dialing devices. Using such devices in conjunction with NobelCom.com services is prohibited. Use of an automatic dialing device in conjunction with NobelCom.com service entitles NobelCom.com to suspend the NobelCom.com account with which the device is being used and to charge a \$50 disconnection fee to that account.

Customers placing calls from outside of the United States of America should use the access numbers provided online at http://www.nobelcom.com/nobelcom/jsp/globalaccess/global_access.jsp for the specific country or region from which each call is made. Using an access number from a country or region other than that for which the access number is designated may incur additional charges of up to \$1.00 per minute for each minute the access number is used in a country or region other than the country or region for which the access number is designated.

Network services are provided by Nobel, LLC, a Delaware Limited Liability Company, and its affiliate carriers. Nobel, LLC is not affiliated with Nobel, Ltd.

17. SEVERABILITY

If any provision of this User Agreement is found to be invalid by any court having competent jurisdiction, the invalidity of such provision shall not affect the validity of the remaining provisions of the User Agreement, which shall remain in full force and effect.

18. WAIVER

No waiver of any of these provisions shall be deemed a further or continuing waiver of such provision or any other provision.

19. FORCE MAJEURE

Nobel is not liable for failure or delay in performing an obligation under this Agreement that is due to causes beyond its control, such as natural catastrophes, governmental acts or omission, laws or regulations, labor strikes or difficulties, computer viruses, war, transportation stoppages or slowdowns or the inability to procure Content, information, service, carriers, Product, Software, or Demonstrations. If any of these causes continue to prevent or delay performance for more than 180 days, you may terminate this Agreement, effective immediately upon notice to Nobel.

20. COMPLETE AGREEMENT

These provisions constitute the entire Agreement between you and Nobel with respect to the use of this Site and any Software, Content, or Product contained therein, unless specified and marked "ADDENDUM" on the site.

21. OFFICIAL CORRESPONDENCE

Official correspondence must be sent via postal mail to:

Nobel, Ltd.
Legal Department
144-146 Vasile Lascar Street
Sector 2
Bucharest, Romania

In the event you have a claim of copyright infringement with respect to Content that is contained in the site, please notify, Nobel Ltd., Customer Support, 144-146 Vasile Lascar Street, Sector 2, Bucharest, Romania or by e-mail at help@NobelCom.com.

[Close window](#)

\$5

RED EYE

HIGH QUALITY CONNECTIONS!



PREPAID PHONE CARD

RED EYE

\$5



PREPAID PHONE CARD

\$5

RED EYE

Disclaimer of Warranty: Except as otherwise provided, NOBEL makes no guarantee, warranty or representation, expressed or implied, regarding the condition, merchantability or fitness of the information or communication services offered for any particular use or purpose. Fees: International rates vary based on country called. Minutes announced are based on using the entire card on a single call. Minutes shown based on one call may vary depending on length of call. Advertised and announced minutes are based on per-minute rates before fees and surcharges are applied. Calls terminating at wireless receivers & Special Service numbers, in certain overseas countries, may be charged a higher rate. The FCC has imposed a pay phone surcharge for 800 calls originating from a pay phone. Any 800 calls originating from a pay phone will be surcharged \$0.99 (except emergency TRS calls). A \$0.79 service fee applies weekly after initial use. Toll free access billed at a higher rate. All calls are billed in 1 minute increments. Federal, state and local taxes may apply. A federally authorized Universal Service Funding (USF) surcharge may apply. Application of surcharges and fees may have the effect of reducing total minutes on card. Cards expire two months after initial usage. Miscellaneous: NOBEL has the right to change or modify terms and conditions, including but not limited to, the prices charged at any time, with method of notice determined at NOBEL sole discretion. The service may not be used for any unlawful purpose. TalkHome is not responsible for lost or stolen cards. Cards have no cash value and are not renewable.

Renuncia de Garantía: A menos de que se indique lo contrario, NOBEL no hace ninguna garantía o representación, expresada o implicada, con respecto a la condición, comerciabilidad o idoneidad de la información o de los servicios de comunicación que se ofrecen para cualquier uso o propósito. Tarifas: Las tarifas internacionales varían según el país al que se llame. Los minutos anunciados son válidos si se utiliza la tarjeta completamente en una sola llamada. Los minutos que se muestran en alguna llamada en particular pueden variar dependiendo de la duración de la llamada. Los minutos publicados y anunciados representan las tarifas antes que incluir cargos adicionales y sobrecargos. Las llamadas que se realicen a destinatarios inalámbricos o a números de Servicio Especial, en algunos países en el extranjero, tendrán tarifas 1¢ más altas. La Comisión Federal de Comunicaciones de los Estados Unidos (FCC) ha impuesto un cargo para las llamadas que se realicen a números 800's desde teléfonos públicos. Toda llamada a números 800 que se realicen desde un teléfono público tendrá un cargo de \$0.99 (con excepción a las llamadas de emergencia de servicio de retransmisión de datos (TRS)). Después del uso inicial, se cobrará un cargo semanal de servicio de \$0.79. Las llamadas a números gratuitos (800's) tienen una tarifa más alta. Todas las llamadas se cobran en incrementos de 1 minuto. Existen cargos de impuestos federales, estatales y locales. Existe un cargo federal autorizado de Fondos de Servicio Universal (USF). Los cargos adicionales afectan el balance de los minutos en las tarjetas. Las tarjetas se vencen dos meses después del uso inicial. Misceláneo: NOBEL tiene el derecho de cambiar o modificar los términos y condiciones, incluyendo pero sin limitarse, los precios que se cobrarán en cualquier momento, el método de esta información se determinará con la única discreción de NOBEL. Se prohíbe usar los servicios para propósitos ilícitos. TalkHome no se hace responsable por tarjetas extraviadas. Las tarjetas no tienen ningún valor en efectivo y no son renovables.

International rates vary based on country called. Minutes announced are based on using the entire card on a single call. Minutes shown based on one call may vary depending on length of call. Advertised and announced minutes are based on per-minute rates before fees and surcharges are applied. Calls terminating at wireless receivers & Special Service numbers, in certain overseas countries, may be charged a higher rate. The FCC has imposed a pay phone surcharge for 800 calls originating from a pay phone. Any 800 calls originating from a pay phone will be surcharged \$0.99 (except emergency TRS calls). A \$0.79 service fee applies weekly after initial use. Toll free access billed at a higher rate. All calls are billed in 1 minute increments. Federal, state and local taxes may apply. A federally authorized Universal Service Funding (USF) surcharge may apply. Application of surcharges and fees may have the effect of reducing total minutes on card. Cards expire two months after initial usage.

Toll-free Customer Support: 1-888-520-8865

USA LOCAL ACCESS:					
Northern California		Southern California		Virginia	
Oakland/Piedmont 510 379 7210		Los Angeles 213 226 9898		Chester 804 318 4779	
Sacramento: Main 916 248 4370		Hollywood/LA 323 317 9038		Cumberland 804 481 1311	
Sacramento: North 916 256 4872		Burbank/Sun Valley 818 827 2864		Dulles 703 574 4189	
San Francisco 415 240 4949		San Fernando Valley 818 488 5552		Dulles Metro 57 174 8406	
San Francisco: South 650 515 3839		Diamond Bar 909 610 4461		Englewood 57 164 2128	
San Jose: North 408 627 8148		Hawthorne 310 531 2868		Fredericksburg 540 446 5127	
San Jose: South 408 532 5802		Ontario 909 937 4408		Hemdon 703 547 8844	
Fresno 559 708 4747		Anaheim 714 422 3898		Kimbridge 434 332 1490	
Oak View, Ojai 805 633 4285		Santa Ana 714 460 1460		La Crosse 434 253 4215	
Modesto 209 794 4107		Huntington Beach 714 475 6798		Lorton 57 122 35044	
Monterey 831 216 4856		Palmdale 661 361 1886		Lorton Metro 57 174 8406	
Salicy, Ventura East 805 918 6109		Chicago, Illinois 708 441 4244		Manassas 703 659 0328	
Bakersfield, Main 861 302 4365		Chicago Zone 2 773 648 5043		Midlothian 804 419 5367	
Santa Maria 805 357 2385		Chicago Zone 3 773 796 5571		Petersburg 804 451 3766	
				Port Royal 804 742 4182	
				Stafford 540 446 5127	
				Triangle 703 291 1086	
				Victoria 434 321 4090	
				Williamsburg 757 645 0716	
				Windsor 757 966 6635	
				Maryland	
				Annapolis 443 569 3823	
				Baltimore 443 552 2544	
				Brandywine 301 579 3687	
				Crofton 410 774 5392	
				Edge Wood 410 670 7516	
				Ellicott City 443 355 4349	
				Gaithersburg 240 724 2955	
				Indian Head 240 724 2955	
				Laurel 240 547 2137	
				Lexington 301 880 1034	
				Sevens Park 410 793 4262	
				Tompkinsville 301 861 4679	
				Towson 443 519 2329	
				District of Columbia	
				Washington 301 637 7532	
				Washington 240 724 2955	
				Washington 703 635 7047	
				Washington 571 748 4806	

Toll Free Number:
1 888 881 1825

PIN

231 587 7068

Toll-free Customer Support: 1-888-520-8865

13015-090365

Attachment 7

Attachment 8



\$2

**baby
boy**
CONNECTICUT



800 & LOCAL ACCESS • ACCESO LOCAL & 800



\$2



**baby
boy**
CONNECTICUT

800 & LOCAL ACCESS • ACCESO LOCAL & 800

WWW.MTCCARD.COM



Minutes prompted are subject to the following conditions. If you have a question on our rates please call our customer service at 1-800-479-9352. Rates are subject to change without notice. Minutes are rounded in 1 plus 3 minute increments. Calls placed to mobile and special service telephones are billed at a higher rate. When using toll free access from a pay phone, a \$0.99 per call surcharge will apply. Service fees of up to 35%, and a call duration charge of up to \$0.49 will apply depending on call location. A weekly maintenance fee of \$0.69 will be charged starting the first day of use. THE AFOREMENTIONED SURCHARGES AND FEES WILL REDUCE THE NUMBER OF MINUTES ADVERTISED FOR THE CARD EVEN IF USED IN A SINGLE CALL. Cards have no cash value and are not returnable or exchangeable. Card expires three (3) months after first use.

Los Minutos Indicados en esta tarjeta estan sujetos a las siguientes condiciones. Si usted tiene alguna pregunta con respecto a nuestras tarifas por favor llamar a nuestro Servicio al Cliente al 1-800-479-9352. Las tarifas estan sujetas a cambios sin previo aviso. Los minutos son redondeados en 1 minuto inicial mas tres minutos de incremento. Las llamadas realizadas a Moviles y Telefonos de Servicios Especiales son facturadas a una tarifa mas elevada. Al utilizar el acceso de una llamada gratuita desde un telefono pago se aplicara una tarifa de \$0.99 por llamada. Gastos por servicios hasta de un 35% y un cargo por duracion de la llamada hasta \$0.49 seran aplicados dependiendo de la localidad de la llamada. Un servicio semanal por mantenimiento de \$0.69 sera aplicado comenzando desde el primer dia de uso de la tarjeta. LOS CARGOS Y GASTOS MENCIONADOS REDUCIRAN EL NUMERO DE MINUTOS ANUNCIADOS POR LA TARJETA AUN CUANDO SEAN USADOS EN UNA SOLA LLAMADA. La tarjeta no tiene un valor en efectivo, no es retornable o canjeable. La tarjeta expira (3) meses despues del primer uso.

ADDITIONAL 2¢ PER MINUTES ON CALL USING TOLL FREE NUMBER.
CARGO DE 2¢ POR MINUTO CUANDO SE USA EL NUMERO DE ACCESO GRATIS

LOCAL ACCESS NUMBERS

STAMFORD (203) 428-4671	NEW HAVEN (203) 672-2115	SOUTHINGTON (860) 738-0045
STAMFORD (203) 428-4860	BRIDGEPORT (203) 683-1290	HARTFORD (860) 760-4989
STAMFORD (203) 428-4861	DANBURY (203) 702-8781	MANCHESTER (860) 812-0297
STAMFORD (203) 428-4872	STAMFORD (203) 724-5803	WINDSORLKS (860) 831-0021
BRIDGEPORT (203) 502-7506	TORRINGTON (860) 201-0037	HARTFORD (860) 956-5725
BRIDGEPORT (203) 502-7508	WILLIMTIC (860) 455-4883	HARTFORD (860) 956-5736
BRIDGEPORT (203) 502-7509	FARMINGTON (860) 606-0241	HARTFORD (860) 967-3976
WATERBURY (203) 568-6797	GLASTONBY (860) 734-0377	HARTFORD (860) 967-3977

PIN#

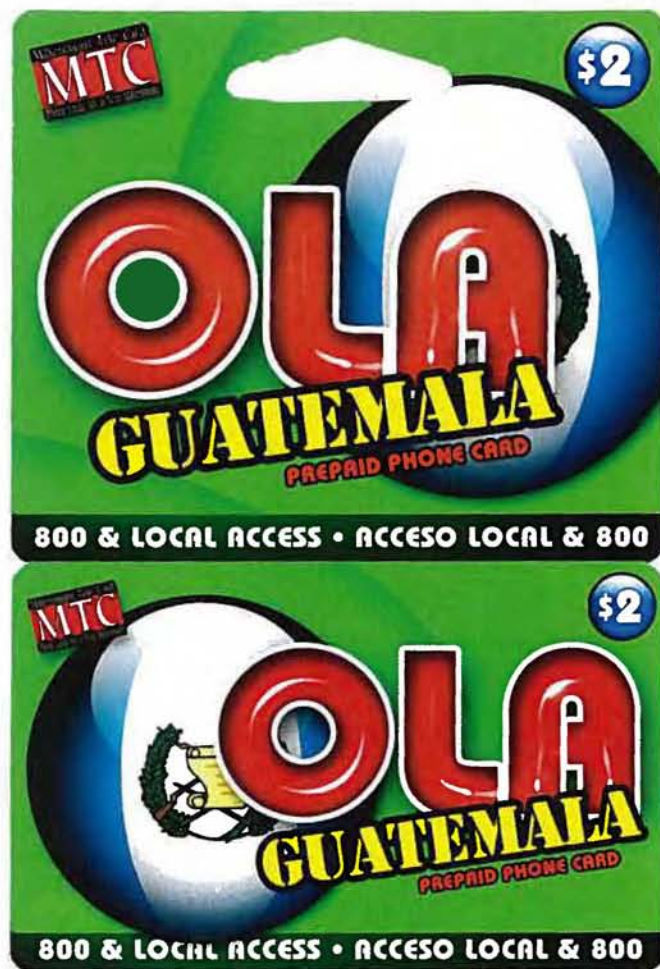
725-351-5810

TOLL FREE ACCESS NUMBER / NUMERO DE ACCESO GRATIS
1 (800) 814-3947

Additional 2¢ per minutes on call using toll free Number.
Cargo de 2¢ por minuto cuando se usa el Numero Gratis.

Customer Service / Servicio al Cliente: 1-800-479-9352
Distributed by: Millennium Telecard / 1-866-340-3002

121-34250





Los Minutos indicados en esta tarjeta están sujetos a las siguientes condiciones. Si usted tiene alguna pregunta con respecto a nuestras tarifas por favor llame a nuestro Servicio al Cliente al 1-800-479-9352. Las tarifas están sujetas a cambios sin previo aviso. Los minutos son redondeados en 1 minuto inicial más tres minutos de incremento. Las llamadas realizadas a Móviles y Telefonos de Servicios Especiales son facturadas a una tarifa más elevada. Al utilizar el acceso de una llamada gratuita desde un telefono pago se aplica una tarifa de \$0.99 por llamada. Gastos por servicios hasta de un 35% y un cargo por duracion de la llamada hasta \$0.49 sean aplicados dependiendo de la localidad de la llamada. Un servicio semanal por mantenimiento de \$0.69 sera aplicado comenzando desde el primer día de uso de la tarjeta. LOS CARGOS Y GASTOS MENCIONADOS REDUCIRAN EL NUMERO DE MINUTOS ANUNCIADOS POR LA TARJETA ALI CUANDO SEAN USADOS A UNA SOLA LLAMADA. La tarjeta no tiene un valor en efectivo, no es retornable o canjeable. La tarjeta expira (3) meses despues del primer uso.

ADDITIONAL 2¢ PER MINUTES ON CALL USING TOLL FREE NUMBER.
CARGO DE 2¢ POR MINUTO CUANDO SE USA EL NUMERO DE ACCESO GRATIS

LOCAL ACCESS NUMBERS / NUMEROS ACCESO LOCAL[illegible]

PIN#

992-105-6616

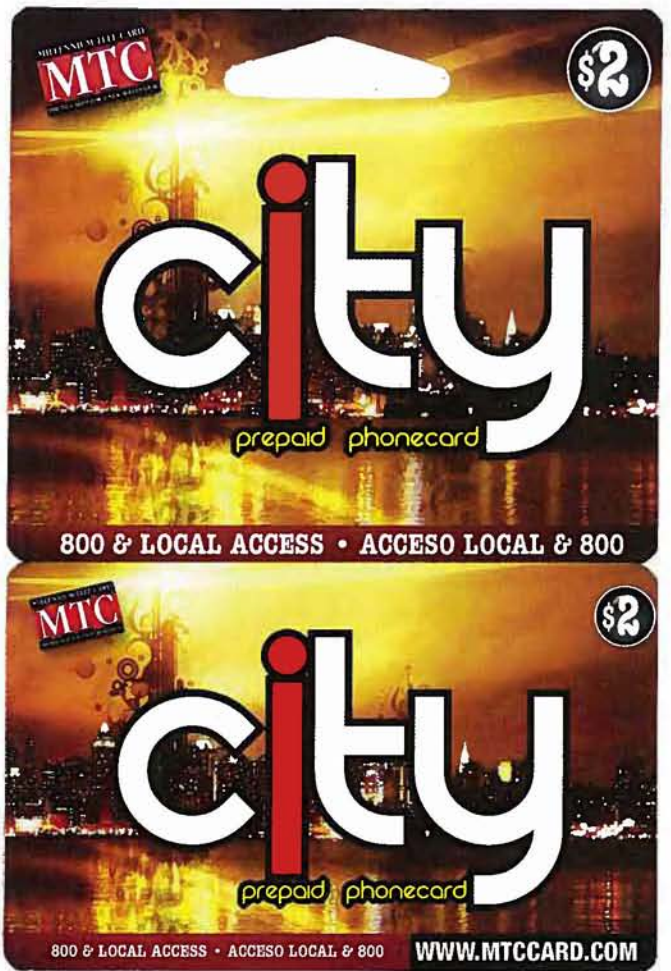
Customer Service / Servicio al Cliente: 1-800-479-9352
Distributed by: 1-866-340-3002

1-800-720-4428

Additional 2c per minutes on call using toll free Number
Cargo de 2c por minuto cuando se usa el Numero Gratís.

105-22300

[illegible]





Minutes prompted are subject to the following conditions. If you have a question on our rates please call our customer service at 1-800-479-9352. Rates are subject to change without notice. Minutes are rounded in 1 plus 2 minute increments. Calls placed to mobile and special service telephones are billed at a higher rate. When using toll free access from a pay phone, a \$0.59 per call surcharge will apply. Service fees of up to 20% and a call duration charge of up to \$0.49 will apply depending on call location. A weekly maintenance fee of \$0.60 will be charged during the first day of use. THE FOREGOING PURCHASES AND FEES WILL REDUCE THE NUMBER OF MINUTES ADVERTISED FOR THE CARD EVEN IF USED VIA SINGLE CALL. Cards have no cash value and are not returnable or exchangeable. Card expires three (3) months after first use.

Los Minutos indicados en esta tarjeta están sujetos a las siguientes condiciones. Si usted tiene alguna pregunta con respecto a nuestros tarifas por favor llamar a nuestro Servicio al Cliente al 1-800-479-9352. Las tarifas están sujetas a cambios sin previo aviso. Los minutos son redondeados en 1 minuto más tres minutos de incremento. Las llamadas realizadas a Móviles y Teléfonos de Servicios Especiales son facturadas a una tarifa más elevada. Al utilizar el acceso de una llamada gratuita desde un teléfono pago se aplicará una tarifa de \$0.59 por llamada. Gastos por servicios hasta de un 20% y un cargo por duración de la llamada hasta \$0.49 serán aplicados dependiendo de la localidad de la llamada. Un servicio semanal por mantenimiento de \$0.60 será aplicado comenzando desde el primer día de uso de la tarjeta. LOS CARGOS Y GASTOS MENCIONADOS REDUCIRÁN EL NÚMERO DE MINUTOS ANUNCIADOS POR LA TARJETA. AUN CUANDO SEAN USADOS EN UNA SOLA LLAMADA. La tarjeta no tiene un valor en efectivo, no es retornable o canjeable. La tarjeta expira (3) meses después del primer uso.

ADDITIONAL 2¢ PER MINUTES ON CALL USING TOLL FREE NUMBER.
CARGO DE 2¢ POR MINUTO CUANDO SE USA EL NÚMERO DE ACCESO GRATIS

(817) 380-1989 KELLER	IN (317) 489-9055 INDIANAPOLIS	(650) 226-9157 SAN CARLOS
(830) 214-7739 NEW BRAUNFELS	(769) 889-4082 RUSSELL	(850) 288-0149 SAN MATEO
(832) 397-6478 HOUSTON	NE (402) 802-9239 LINCOLN	(661) 349-7301 PULP PLD.
(803) 200-4966 COLLINGS	ND (701) 212-1253 FARGO	(707) 879-1027 TAMALESS
(915) 613-0529 EL PASO	CA (213) 281-9515 LOS ANGELES	(714) 408-9257 ANAHEIM
(936) 755-1432 HUNTSVILLE	(310) 421-2461 REDONDO	(760) 670-3831 ESCOBARDO
(940) 202-4576 TIOGA	(323) 203-0767 LOS ANGELES	(805) 426-4755 SAN VALLEY
(956) 467-5713 MCALLEN	(408) 212-0712 SUNNYVALE	(831) 709-4646 BEN LOMOND
(972) 505-2676 IRVING	(510) 860-4046 RICHMOND	(818) 462-5818 RESEDA
(979) 217-4700 WALLIS	(530) 554-4016 DAVIS	(858) 309-4971 SMOG LITA
(262) 566-6048 WAUKESHA	(559) 761-1861 FRESNO	(864) 640-4473 GREENVILLE
(414) 455-4811 MILWAUKEE	(562) 453-3870 LONG BEACH	(909) 839-4396 RIVERSIDE
(715) 598-9725 EAU CLAIRE	(619) 866-3644 SAN DIEGO	(916) 248-8884 SCOTLAND
(920) 471-0195 GREEN BAY	(626) 709-4748 LA PUENTE	(925) 232-0013 PLEASANT

LOCAL ACCESS NUMBERS • NÚMEROS ACCESO LOCAL

MIN (612) 235-7429 MINNEAPOLIS (612) 240-3924 MINNEAPOLIS (651) 356-6067 ST. PAUL (763) 515-2064 OSSEO (952) 314-8958 CHASKA NC (919) 800-0251 RALEIGH (919) 805-3838 RALEIGH (336) 790-7182 GREENSBORO (704) 315-6370 CHARLOTTE (910) 338-4634 WILMINGTON (919) 805-3847 RALEIGH SC (803) 753-1257 COLUMBIA (803) 823-4650 MANNING (843) 277-6102 CHARLESTON (864) 640-4476 GREENVILLE OH (216) 539-0501 CLEVELAND	IL (234) 542-5782 AKRON (419) 329-4736 TOLEDO (440) 249-4017 TROY (513) 259-2571 CINCINNATI (567) 202-0329 TOLEDO (614) 452-4101 COLUMBUS (637) 462-4090 SPOONVALEIN (219) 228-1122 HANNAHMO (224) 633-1014 BARRINGTON (312) 324-3453 CHICAGO (618) 215-2102 E. ST. LOUIS (803) 592-0161 ELKHART (708) 263-4965 TIMELYPARK (773) 295-1226 CHICAGO (847) 984-0017 LIBERTYVILLE MI (231) 354-2177 CORAL	TX (248) 218-0146 ROCHESTER (313) 263-3898 DETROIT (517) 803-2338 LANSING (588) 838-2388 WARREN (616) 723-8824 GRAND RAPIDS (734) 258-4268 JELLY (810) 420-1134 MAURETTE (210) 775-6268 SAN ANTONIO (214) 329-1736 DALLAS (281) 828-4694 SPRING (361) 741-4285 YAGUAI (432) 614-6278 ODessa (469) 212-9100 GRAND PRAIR (512) 961-7242 AUSTIN (682) 237-1164 ROANOK (713) 491-4879 HOUSTON
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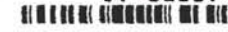
TOLL FREE ACCESS NUMBER / NÚMEROS ACCESO GRATIS
1-800-730-5301

Additional 2¢ per minutes on call using toll free Number.
 Cargo de 2¢ por minuto cuando se usa el Número Gratis.

Customer Service / Servicio al Cliente: 1-800-479-9352
 Distributed by: Millennium Telecard / 1-866-340-3002

PIN# **504-453-1680**

97-01557



MTC Golden SIN CARGO DE CONEXION
ACCESO LOCAL & 800 **CARIBBEAN** Phone Card

JAMAICA 187 MINS / \$5	HAITI 60 MINS / \$5	DOMINICAN REP. 250 MINS / \$5
JAMAICA 60 CELL MINS / \$5	HAITI 40 CELL MINS / \$5	BARBADOS 50 MINS / \$5
GUAM 416 MINS / \$5	DOMINICA 54 MINS / \$5	
TRINIDAD & TOBAGO 62 MINS / \$5	BAHAMAS 142 CELL MINS / \$5	PUERTO RICO 505 MINS / \$5
GUYANA 35 CELL MINS / \$5	BERMUDA 100 CELL MINS / \$5	
ST. LUCIA 83 MINS / \$5	ST. VINCENT 83 MINS / \$5	ST. KITTS 83 MINS / \$5
PANAMA 303 PANAMA CITY MINS / \$5	U.S.A. 500 MINS / \$5	

COUNTRY	\$2	\$5	COUNTRY	\$2	\$5	COUNTRY	\$2	\$5
ARGENTINA	181	500	DOMINICAN REP	100	250	PANAMA - CITY	121	303
- BUENOS AIRES	400	1000	- CELL	33	90	- CELL	20	50
- CORDOBA	400	1000	ECUADOR	36	90	PERU	80	200
- CELL	13	35	- CELL	16	40	- LIMA	200	602
BAHAMAS + CELL	57	142	EL SALVADOR	40	111	- CELL	12	31
BARBADOS	20	50	- CELL	28	71	PUERTO RICO	200	505
- CELL	15	36	GUAM + CELL	166	416	ST KITTS	33	83
BERMUDA + CELL	40	100	GUATEMALA	40	111	ST KITTS - CELL	22	58
BRAZIL	121	312	- CELL	28	73	ST LUCIA	33	83
- BELO HORIZONTE	153	384	GUYANA + CELL	13	35	ST LUCIA - CELL	22	58
- RIO	281	700	HAITI	24	60	ST PIERRE	25	62
- SAO PAULO	281	700	- CELL	16	40	ST PIERRE - CELL	33	83
- CELL	28	71	HONDURAS	10	25	ST VINCENT	33	83
COLOMBIA	55	166	- CELL	9	22	ST VINCENT - CELL	25	45
- BARANQUILLA	142	357	JAMAICA	74	187	TRINIDAD&TOBAGO	25	62
- BOGOTA	142	357	- CELL	23	60	- CELL	22	56
- CALI	142	357	MEXICO	50	136	USA	200	500
- MEDELLIN	142	166	- MEXICO CITY	133	333	VENEZUELA	100	250
- CELL	36	90	- GUADALAJARA	133	333	- CARACAS	133	333
DOMINICA	26	54	- MONTERREY	133	333	- MARACAIBO	100	250
- CELL	13	31	PANAMA	80	200	- CELL	15	38

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